

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LAKISHA REYNOLDS, *et al.*,

Plaintiffs,

-against-

98 Civ. 8877

RUDOLPH GIULIANI, *et al.*,

Defendants.

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DECLARATION OF JULIA RUSSELL

Julia Russell declares, pursuant to 28 U.S.C. § 1746:

1. I am a member in good standing of the Bar of this Court and a Coordinating Senior Attorney in the Special Litigation Unit at the New York Legal Assistance Group, one of counsel for plaintiffs in this action.
2. I submit this declaration in support of Plaintiffs' motion to extend the Corrective Action Plan ("CAP") so-ordered by this Court on April 19, 2024.
3. I have worked on monitoring and enforcing the City Defendants' compliance with the 2005 Reynolds Order and with statutory and regulatory requirements governing the provision of public assistance benefits as part of my job duties since October 2008.
4. Each month, I review the monitoring and sampling data sent to Plaintiffs' Counsel pursuant to paragraphs 4 and 5 of the CAP.
5. Attached as Exhibit A is a data report produced by the City Defendants to Plaintiffs in March 2025 pursuant to paragraph 4 of the CAP. In January 2025, only 73.8% of the

7,426 households that presented with a no-food emergency received a timely Immediate Needs Grant, meaning that 1,945 households went hungry.

6. Attached as Exhibit B is a data report produced by the City Defendants to Plaintiffs in April 2025 pursuant to paragraph 4 of the CAP. In February 2025, only 75.9% of the 5,519 households that presented with a no-food emergency received a timely Immediate Needs Grant, meaning that 1243 households went hungry.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: May 21, 2025

New York, New York

/s/ Julia Russell

Julia Russell